

1 GARY A. BORNSTEIN (*pro hac vice*)
gbornstein@cravath.com
2 YONATAN EVEN (*pro hac vice*)
yeven@cravath.com
3 LAUREN A. MOSKOWITZ (*pro hac vice*)
lmoskowitz@cravath.com
4 JUSTIN C. CLARKE (*pro hac vice*)
jcclarke@cravath.com
5 MICHAEL J. ZAKEN (*pro hac vice*)
mzaken@cravath.com
6 M. BRENT BYARS (*pro hac vice*)
mbyars@cravath.com

CRAVATH, SWAINE & MOORE LLP
7 375 Ninth Avenue
New York, New York 10001
8 Telephone: (212) 474-1000
Facsimile: (212) 474-3700

9
10 PAUL J. RIEHLE (SBN 115199)
paul.riehle@faegredrinker.com

FAEGRE DRINKER BIDDLE & REATH LLP
11 Four Embarcadero Center
San Francisco, California 94111
12 Telephone: (415) 591-7500
Facsimile: (415) 591-7510

13
14 *Attorneys for Plaintiff and Counter-defendant*
Epic Games, Inc.

15 **UNITED STATES DISTRICT COURT**

16 **NORTHERN DISTRICT OF CALIFORNIA**

17 **OAKLAND DIVISION**

18
19 EPIC GAMES, INC.,

20 Plaintiff, Counter-defendant,

21 v.

22
23 APPLE INC.,

24 Defendant, Counterclaimant.

25
26 Case No. 4:20-CV-05640-YGR-TSH

27
28 **PLAINTIFF'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED PURSUANT TO
CIVIL LOCAL RULE 79-5**

Judge: Hon. Yvonne Gonzalez Rogers

PLAINTIFF'S ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER PARTY'S
MATERIAL SHOULD BE SEALED

CASE NO. 4:20-CV-05640-YGR-TSH

1 Pursuant to Civil Local Rules 7-11 and 79-5(f), Plaintiff Epic Games, Inc. (“Epic”)
 2 submits this administrative motion to consider whether another party’s material should be sealed
 3 with respect to its Objections to Special Master Determinations Issued May 14, 2025, Regarding
 4 Apple’s Withheld Documents, the Declaration of Yonatan Even (“Even Declaration”) and Exhibit
 5 A, all dated May 20, 2025. The documents and portions of documents Epic seeks to temporarily
 6 file under seal are listed below:

Document	Corresponding Page and Line Number(s)
Exhibit A to the Even Declaration	Document in its entirety.

10 Epic seeks leave to provisionally file the documents under seal because they
 11 discuss materials that Apple has designated confidential under the protective order in this case.
 12 *See Local Rule 79-5(f).* Epic reserves the right to oppose, under Rule 79-5(f)(4), any submission
 13 Apple makes to support sealing under Rule 79-5(f)(3). Epic also hereby provides notice of
 14 lodging to all parties and their counsel pursuant to Civil Local Rule 79-5(f).

15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25
 26
 27
 28

1 Dated: May 20, 2025

Respectfully submitted,

2 By: /s/ Yonatan Even
3

4 **FAEGRE DRINKER BIDDLE & REATH
LLP**

5 Paul J. Riehle (SBN 115199)
6 paul.riehle@faegredrinker.com

7 Four Embarcadero Center
8 San Francisco, California 94111
9 Telephone: (415) 591-7500
Facsimile: (415) 591-7510

10 **CRAVATH, SWAINE & MOORE LLP**

11 Gary A. Bornstein (*pro hac vice*)
gbornstein@cravath.com
12 Yonatan Even (*pro hac vice*)
yeven@cravath.com
13 Lauren A. Moskowitz (*pro hac vice*)
lmoskowitz@cravath.com
14 Justin C. Clarke (*pro hac vice*)
jcclarke@cravath.com
15 Michael J. Zaken (*pro hac vice*)
mzaken@cravath.com
16 M. Brent Byars (*pro hac vice*)
mbbyars@cravath.com

17
18 375 Ninth Avenue
19 New York, New York 10001
20 Telephone: (212) 474-1000
Facsimile: (212) 474-3700

21 *Attorneys for Plaintiff and Counter-defendant
Epic Games, Inc.*